

RESPONSE TO REQUEST FOR PRODUCTION NO. 169:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 170:

All DOCUMENTS discussing or referring to any delays in the release of any INTEL MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 170:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 171:

All DOCUMENTS discussing or referring to any manufacturing, process, design and/or technological problems with any INTEL MICROPROCESSOR product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 171:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 172:

All DOCUMENTS discussing, referring to or prepared in connection with the recall of an INTEL MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 172:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 173:

All DOCUMENTS constituting, discussing or referring to customer complaints to INTEL by an OEM, RETAILER, DISTRIBUTOR or ODM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 173:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 174:

All DOCUMENTS constituting, discussing or referring to any responses or proposed responses to any customer complaints to INTEL by an OEM, RETAILER, DISTRIBUTOR or ODM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 174:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 175:

All DOCUMENTS constituting, reflecting or pertaining to any contracts, licenses, or agreements between INTEL and any third party that place any limitations, prohibitions, or restrictions on that third party's ability to design, develop, implement, license or promote technology for use with AMD MICROPROCESSORS or CHIPSETS or to conduct business that relates in any way to AMD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 175:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such

Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 176:

All DOCUMENTS referring, relating or pertaining to AMD's participation in or exclusion from any industry standard setting organization, formal or informal technology alliance, joint development partnership, or other group or entity that designs, develops, implements, discusses, sponsors, or promotes any standard, specification, or technology in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 176:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 177:

All DOCUMENTS referring, relating or pertaining to AMD's access to, or limitations, restrictions, or delays in AMD's access to, information, specifications, or standards developed in any industry standard setting organization, formal or informal technology alliance, joint development partnership, or other group or entity that designs, develops, implements, discusses, sponsors, or promotes any standard, specification, or technology in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 177:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and

will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 178:

All DOCUMENTS referring, relating or pertaining to INTEL's strategies or reasons for participating in any industry standard setting organization, formal or informal technology alliance, joint development partnership, or other group or entity that designs, develops, implements, discusses, sponsors, or promotes any standard, specification, or technology relating to MICROPROCESSORS or CHIPSETS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 178:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, its Specific Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 179:

All DOCUMENTS referring, relating, or pertaining to Intel's participation in any industry standard setting organization, formal or informal technology alliance, joint development partnership, or other group or entity that designs, develops, implements, discusses, sponsors, or

promotes any standard, specification, or technology relating to MICROPROCESSORS or CHIPSETS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 179:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 180:

All DOCUMENTS referring, relating or pertaining to INTEL's formation of, or efforts to form, any organization, entity, partnership, alliance, or relationship with others to develop a standard or specification for any generation of DDR SDRAM (e.g., DDR SDRAM, DDR2 SDRAM, DDR3 SDRAM and DDR4 SDRAM) memory devices, controllers, interfaces, or other related memory standard or specification.

RESPONSE TO REQUEST FOR PRODUCTION NO. 180:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the

Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 181:

All DOCUMENTS referring, relating or pertaining to AMD's participation in or exclusion from any organization, entity, partnership, alliance, or other relationship involving INTEL to develop a standard or specification for any generation of the DDR SDRAM (e.g., DDR SDRAM, DDR2 SDRAM, DDR3 SDRAM and DDR4 SDRAM) memory devices, controllers, interfaces, or other related memory standard or specification including, but not limited to, the Advanced DRAM Technology (ADT) Consortium and any partnerships or alliances relating to post-DDR3 SDRAM technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 181:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 182:

All DOCUMENTS constituting, reflecting or pertaining to any memory module pin definition proposals, presentations, speeches, speaker's notes, or handouts by INTEL relating to

any generation of DDR SDRAM devices (e.g., DDR SDRAM, DDR2 SDRAM, DDR3 SDRAM and DDR4 SDRAM), and any drafts, revisions, or versions thereof.

RESPONSE TO REQUEST FOR PRODUCTION NO. 182:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 183:

All DOCUMENTS constituting, reflecting or pertaining to any specifications or standards, or any proposals, drafts, revisions, or versions thereof, relating to Secure I/O, LaGrande Technology (LT), Palladium, Next Generation Secure Computing Base (NGSCB), Trusted Platform Module (TPM), Trusted Network Connect (TNC), Network Access Protection (NAP), or any other initiative relating to the security of input or output interfaces in computer systems including, but not limited to, those initiatives sponsored by the Trusted Computing Platform Alliance, Trusted Computing Group, PCI SIG, USB Implementers Forum, IEEE, or any successor entities or organizations, or informal alliances in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 183:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the ground that it calls for

information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 184:

All DOCUMENTS constituting, reflecting or pertaining to any technical overviews, presentations, tutorials, white papers, marketing documents or other general descriptions of any specifications or standards relating to Secure I/O, LaGrande Technology (LT), Palladium, Next Generation Secure Computing Base (NGSCB), Trusted Platform Module (TPM), Trusted Network Connect (TNC), Network Access Protection (NAP), or any other initiative relating to the security of input or output interfaces in computer systems including, but not limited to, those initiatives sponsored by the Trusted Computing Platform Alliance, Trusted Computing Group, PCI SIG, USB Implementers Forum, IEEE, or any successor entities or organizations, or informal alliances in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 184:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the ground that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 185:

All DOCUMENTS referring, relating or pertaining to AMD's participation in or exclusion from the design, development, implementation, licensing or promotion of any specification, standard, protocol, or technology relating to Secure I/O, LaGrande Technology (LT), Palladium, Next Generation Secure Computing Base (NGSCB), Trusted Platform Module (TPM), Trusted Network Connect (TNC), Network Access Protection (NAP), or any other initiative relating to the security of input or output interfaces in computer systems including, but not limited to, those initiatives sponsored by the Trusted Computing Platform Alliance, Trusted Computing Group, PCI SIG, USB Implementers Forum, IEEE, or any successor entities or organizations, or informal alliances in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 185:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 186:

All DOCUMENTS referring, relating or pertaining to INTEL's decision to partner with any third party regarding the design, development, implementation, licensing or promotion of any

standards, specifications, protocols or technology relating to Secure I/O, LaGrande Technology (LT), Palladium, Next Generation Secure Computing Base (NGSCB), Trusted Platform Module (TPM), Trusted Network Connect (TNC), Network Access Protection (NAP), or any other initiative relating to the security of input or output interfaces in computer systems including, but not limited to, those initiatives sponsored by the Trusted Computing Platform Alliance, Trusted Computing Group, PCI SIG, USB Implementers Forum, IEEE, or any successor entities or organizations, or informal alliances in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 186:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the ground that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 187:

All DOCUMENTS constituting, reflecting or pertaining to any specifications or standards, or any proposals, drafts, revisions, or versions thereof, relating to the Advanced Server Management Interface, Active Management Technology (iAMT), Virtualization Technology (VT), 110 Acceleration Technology (I/OAT), PCI Express, Serial Digital Video Output (SDVO), 802.11n, East Fork, Digital Home, VIIV, any software product involving VM Ware, any battery

or power management technology involving Matsushita or Panasonic, or any related or competing technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 187:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 188:

All DOCUMENTS constituting, reflecting or pertaining to any technical overviews, presentations, tutorials, white papers, marketing documents or other general descriptions concerning the Advanced Server Management Interface, Active Management Technology (iAMT), Virtualization Technology (VT), I/O Acceleration Technology (I/OAT), PCI Express, Serial Digital Video Output (SDVO), 802.11n, East Fork, Digital Home, VIIV, any software product involving VM Ware, any battery or power management technology involving Matsushita or Panasonic, or any related or competing technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 188:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably

calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 189:

All DOCUMENTS referring, relating or pertaining to AMD's participation in or exclusion from the design, development, implementation, licensing or promotion of any specification, standard, or protocol relating the Advanced Server Management Interface, Active Management Technology (iAMT), Virtualization Technology (VT), YO Acceleration Technology (YOAT), PCI Express, Serial Digital Video Output (SDVO), 802.11n, East Fork, Digital Home, VIIV, any software product involving VM Ware, any battery or power management technology involving Matsushita or Panasonic, or any related or competing technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 189:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 190:

All DOCUMENTS referring, relating or pertaining to INTEL's decision to partner with any third party regarding the design, development, implementation, licensing or promotion of any standards, specifications, protocols or technology relating to the Advanced Server Management Interface, Active Management Technology (iAMT), Virtualization Technology (VT), 110 Acceleration Technology (I/OAT), PCI Express, Serial Digital Video Output (SDVO), 802.11n, East Fork, Digital Home, VIIV, any software product involving VM Ware, any battery or power management technology involving Matsushita or Panasonic, or any related or competing technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 190:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 191:

All DOCUMENTS constituting, reflecting, or pertaining to any complaints by third parties, or INTEL's response to such complaints, regarding any INTEL compiler.

RESPONSE TO REQUEST FOR PRODUCTION NO. 191:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 192:

All DOCUMENTS referring, relating or pertaining to INTEL's design, development or implementation of CPUID or any other software feature in any INTEL compiler that detects the identity of the MICROPROCESSOR in a COMPUTER SYSTEM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 192:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including

files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 193:

All DOCUMENTS referring, relating or pertaining to any features or functionality of INTEL's compilers that are not enabled, activated, or used, or, conversely, are only enabled, activated, or used, when the software is operated on a COMPUTER SYSTEM with a non-INTEL MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 193:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 194:

All DOCUMENTS referring, relating, or pertaining to the comparative performance of software compiled by any INTEL compiler when operated on COMPUTER SYSTEMS with INTEL vs. non-INTEL MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 194:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 195:

All DOCUMENTS referring, relating, or pertaining to any patches, modifications, or other changes to any INTEL compiler to alter or improve the performance of software compiled by that INTEL compiler when operated on a COMPUTER SYSTEM with a non-INTEL MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 195:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated

Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 196:

All DOCUMENTS referring, relating or pertaining to any third party's incorporation, implementation, support, use or promotion of AMD's 64-bit instruction set in any software product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 196:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 197:

All DOCUMENTS referring, relating or pertaining to the timing of any third party's design, development, promotion or release of any software product that incorporates, implements, supports or uses AMD's 64-bit instruction set.

RESPONSE TO REQUEST FOR PRODUCTION NO. 197:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its

subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 198:

All DOCUMENTS constituting, reflecting or pertaining to any studies, analyses, reports, memoranda, investigations, submissions, proposals, bids, presentations or communications regarding the use of INTEL or AMD MICROPROCESSORS in Microsoft's X-Box game console.

RESPONSE TO REQUEST FOR PRODUCTION NO. 198:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 199:

All DOCUMENTS referring, relating or pertaining to any AMD submission, proposal, bid, presentation or communication relating to the use of AMD MICROPROCESSORS in Microsoft's X-Box game console.

RESPONSE TO REQUEST FOR PRODUCTION NO. 199:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and

will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 200:

All non-disclosure agreements between INTEL and any INTEL MICROPROCESSOR customer or INTEL PARTNER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 200:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the term "INTEL PARTNER" is overly broad, vague, ambiguous, and not subject to reasonable interpretation. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 201:

All pleadings, correspondence, discovery requests and responses, briefs, affidavits and declarations, orders, deposition transcripts, hearing transcripts, documents produced by INTEL, and settlement agreements in the litigation entitled *Intergraph Corporation v. Intel Corporation*, Case No. CV 97-N-3023-NE, U.S. District Court, Northern District of Alabama, Northeastern Division, filed on or about November 17, 1997.

RESPONSE TO REQUEST FOR PRODUCTION NO. 201:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is overly broad

and unduly burdensome. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to these objections, Intel will produce all documents from the *Intergraph* litigation that (i) either were produced by Intel or contain Intel information (such as depositions of Intel witnesses); and (ii) are relevant to the subject matter of this action. Intel does not intend to produce documents that relate to the patent and other non-antitrust allegations in the *Intergraph* action.

REQUEST FOR PRODUCTION NO. 202:

All pleadings, correspondence, discovery requests and responses, briefs, affidavits and declarations, orders, deposition transcripts, hearing transcripts, documents produced by INTEL, and settlement agreements in the litigation entitled *Intergraph Hardware Technologies Company v. Dell, Hewlett-Packard, and Gateway*, Eastern District of Texas, Marshall Division, Civil Action No. 2-02CV312 (TJW).

RESPONSE TO REQUEST FOR PRODUCTION NO. 202:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this request on the grounds that it is overly broad and unduly burdensome. Intel also objection to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to these objections, Intel will produce all documents from the *Intergraph* litigation that (i) either were produced by Intel or contain Intel information (such as depositions of Intel witnesses); and (ii) are relevant to the subject matter of this action. Intel does not intend to produce documents that relate to the patent and other non-antitrust allegations in the *Intergraph* action.

REQUEST FOR PRODUCTION NO. 203:

All DOCUMENTS constituting, referring, relating or pertaining to any agreement or other arrangement pursuant to which INTEL paid consideration to or on behalf of Dell in connection with the settlement of patent infringement litigation brought against Dell by Intergraph Corporation.

RESPONSE TO REQUEST FOR PRODUCTION NO. 203:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 204:

DOCUMENTS sufficient to fully describe INTEL's document retention policies in effect at any time since January 1, 2000.

RESPONSE TO REQUEST FOR PRODUCTION NO. 204:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will produce non-privileged documents sufficient to describe the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 205:

All DOCUMENTS evidencing, reflecting or pertaining to INTEL's destruction of DOCUMENTS pursuant to or in violation of INTEL's document retention policies and procedures.

RESPONSE TO REQUEST FOR PRODUCTION NO. 205:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this request on the grounds that it is unduly

burdensome and calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel also objects to this request on the grounds that it is argumentative, harassing, and lacks foundation. Based on the parties' meet and confer, Intel understands that this Request is limited to any instances in which violations of Intel's document retention policy were reported internally via the appropriate channels.

Subject to its General Objections, its Specific Objections, and Intel's understanding of this Request based upon the parties' meet and confer, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 206:

All DOCUMENTS constituting or reflecting communications with or among third parties concerning this litigation, the allegations in the Complaint, or any alleged improper or exclusionary conduct by INTEL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 206:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department

files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 207:

All DOCUMENTS upon which INTEL relies to support any of the denials, allegations, or statements in INTEL's Answer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 207:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian, except that to the extent Intel's Answer denies allegations that have now been stricken Intel will not produce any such documents..

REQUEST FOR PRODUCTION NO. 208:

All DOCUMENTS upon which INTEL relies to support any of its affirmative defenses in its Answer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 208:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 209:

All DOCUMENTS, data compilations, and tangible things that are in the possession, custody, or control of INTEL, that INTEL may use to support its claims or defenses

RESPONSE TO REQUEST FOR PRODUCTION NO. 209:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 210:

All DOCUMENTS that relate to YOUR actions to manage inventories, including, but not limited to, the impact of such actions on your microprocessor manufacturing or sales, financial performance, and profitability.

RESPONSE TO REQUEST FOR PRODUCTION NO. 210:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 211:

All DOCUMENTS that relate to any steps that YOU took to align inventories or eliminate obsolete product from YOUR inventories, customer's inventories, or your supply chain,

including, but not limited to, the impact of such actions on your MICROPROCESSOR manufacturing, sales, financial performance, or profitability.

RESPONSE TO REQUEST FOR PRODUCTION NO. 211:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 212:

All DOCUMENTS that relate to the impact on YOUR MICROPROCESSOR sales, financial performance, and profitability from transitioning to a new or different semiconductor manufacturing technology node (the nanometer dimension of the microprocessor feature size).

RESPONSE TO REQUEST FOR PRODUCTION NO. 212:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 213:

All DOCUMENTS that relate to YOUR ability or inability to satisfy customer demands for MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 213:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 214:

All DOCUMENTS relating to complaints about problems with or deficiencies in YOUR sales force.

RESPONSE TO REQUEST FOR PRODUCTION NO. 214:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 215:

All DOCUMENTS relating to the projected or planned introduction date by INTEL of any product competing in a MICROPROCESSOR market.

RESPONSE TO REQUEST FOR PRODUCTION NO. 215:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and

will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 216:

All DOCUMENTS that relate to the decision to end the life of any MICROPROCESSOR product, including the decision to reduce price as the MICROPROCESSOR product was phased out.

RESPONSE TO REQUEST FOR PRODUCTION NO. 216:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 217:

All DOCUMENTS provided by INTEL to, or seized from INTEL by, any U.S., state, or foreign governmental competition authority relating to INTEL, AMD, or competition in the MICROPROCESSOR industry, excluding briefs, white papers or other submissions prepared for purposes of communication with any such competition authority.

RESPONSE TO REQUEST FOR PRODUCTION NO. 217:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is overly broad and calls for information that is neither

relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian, except that pursuant to General Objection No. 4 Intel will not produce any such documents that were provided by Intel to or seized from Intel by any foreign governmental competition authority.

REQUEST FOR PRODUCTION NO. 218:

All DOCUMENTS prepared for or in connection with a QBR (quarterly business review) with any INTEL MICROPROCESSOR customer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 218:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

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EXHIBIT A

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Long, Steven	Wang, Robert
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